

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RALPH M. WATSON, an individual,

Plaintiff,

v.

NY DOE 2, an individual; NY DOE 3, an individual; NY DOE 4, an individual; ILLINOIS DOE 1, an individual; DOE COMPANY, an unknown business entity; DOE 1, an individual; and DOES 2 through 100, whose true names and capacities are unknown,

Defendants.

Case No. 1:19-cv-533

**DEFENDANT NOTICE OF NY DOE 2'S MEMORANDUM OF LAW  
IN SUPPORT OF THEIR MOTION TO DISMISS PLAINTIFF'S  
FIRST AMENDED COMPLAINT**

PLEASE TAKE NOTICE that, upon the enclosed Memorandum of Law in Support of Their Motion to Dismiss Plaintiff's First Amended Complaint, and the supporting Declaration of Tali R. Leinwand, dated August 16, 2019, and accompanying exhibits, Defendant NY Doe 2 hereby moves this Court before the Honorable John G. Koeltl, United States District Court Judge, Southern District of New York, at the United States Courthouse located at 500 Pearl St., New York, New York 10007, for an Order dismissing this action with prejudice and costs under Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted.

DATED: New York, New York  
August 16, 2019

By: /s/ Laura P. MacDonald

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